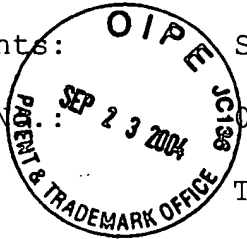


IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: Sellen et al.
Serial No.: 09/773,090
For: TEXT PROCESSING SYSTEM
Filed: January 31, 2001
Examiner: Chau T. Nguyen
Art Unit: 2176
Confirmation No.: 6082
Customer No.: 27623



RECEIVED
SEP 27 2004
Technology Center 2100

Attorney Docket No.: 30003278

REQUEST FOR RECONSIDERATION

Mail Stop Amendment
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

In reply to the first Office Action dated May 21, 2004, Applicants respectfully submit the following response.

Claims 1-18 are pending in the application. Applicants respectfully submit, for reasons that will become apparent below, that the rejection of claims 1-18 under 35 U.S.C. 103(a) is erroneous, and should be withdrawn. Reconsideration of this application is respectfully requested.

The Office Action rejects claims 1-8 and 10-18 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,727,894 by Karidis et al., hereinafter "Karidis", in view of

U.S. Patent No. 6,396,598 by Kashiwagi et al., hereinafter "Kashiwagi". Applicants respectfully traverse the rejection on the grounds that the combination of Karidis and Kashiwagi fails to disclose or suggest all of the features of independent claims 1, 10 and 15.

Claim 1 provides for a text processing apparatus. The text processing apparatus includes a first text editing unit having a screen upon which text may be displayed, and a first manual actuator by means of which a user is able to interact with text displayed on the first screen. Also included is a second text editing unit having a second screen upon which text may be displayed, and a second manual actuator by means of which a user is able to interact with text displayed on the second screen. The first and second actuators are independently operable, and enable interaction with text displayed on respective screens independently of each other. The first and second text editing units are connected to each other to enable text to be imported from one unit directly to another unit, thereby to enable text selected from a first document displayed on one unit to be inserted directly at a predetermined location in a document displayed on the other unit.

Karidis discloses a flexibly interfaceable portable computing device (abstract). The device features a display coupled to a processor that is coupled to either or both of a keyboard and a handwriting recording unit (col. 2, lines 22-25). The display and the keyboard provide a first user interface to the processor (col. 2, lines 25-26). The handwriting recording unit includes a working surface, a markable surface and a stylus that provides a stroke signal and a stroke mark (col. 2, lines 28-32). The stroke signal conveys information to the

handwriting recording unit (col. 2, lines 32-33). The handwriting recording unit, markable surface and stylus provide a second user interface to the processor (col. 2, lines 34-36).

However, the **handwriting recording unit** described in Karidis is not a **text editing unit**, as the handwriting recording unit is only disclosed as able to record information entered by a stylus. There is no indication of an ability of the handwriting recording unit to edit text. Therefore, Karidis fails to disclose "a second text editing unit", as recited in claim 1.

The Office Action admits that Karidis does not disclose enabling text selected from a first document displayed on one unit to be inserted directly at a predetermined location in a document displayed on the other unit. However, Applicants disagree with the Office Action's contention that this feature is disclosed in Kashiwagi.

Kashiwagi discloses an electronic memo adding and displaying apparatus (abstract). The apparatus allows addition and display of an electronic memo to a document no matter whether the document is electronic or paper (col. 1, lines 11-14). The apparatus allows for addition of an electronic memo to a document, "with a feeling as if a comment is written by a pen on a sheet of paper . . ." (col. 4, lines 34-37). The apparatus includes a document identifying device, an electronic memo relating to a document, an electronic memo retrieving device for retrieving a memo from a storage device, and a display device for displaying the memo on a virtual transparent input sheet registered or positioned to be overlapped with the object document (col. 4, line 64 - col. 5, line 5). The electronic

memo and document are viewed together as if the memo is written on the document (col. 5, lines 8-10). There is also disclosed a pen track position adjusting unit 642 that re-adjusts the position of the pen track data that is displayed with the original document file image (col. 27, lines 21-23). In this way, even if an electronic memo is added to a document and the document is later modified, e.g. by deletion, insertion, or copy from another portion of the document, causing a change in the layout, the electronic memo can still be displayed at the correct position on the document (col. 26-35). The following quotation further describes the function of the apparatus disclosed in Kashiwagi:

"In this manner, it becomes possible to relate, on a computer, a document on a paper medium and an electronic memo related to the document, to display the memo on the document, and to input an electronic memo to the computer by manually writing the memo overlapped with the document."
(col. 17, lines 42-48)

Whereas Kashiwagi discloses a device for **overlapping** an image of a memo on a document, it does not describe directly **inserting** text from one unit at a predetermined location in a document displayed on another unit. Kashiwagi's description of adding an electronic memo to a document, and displaying the memo as if it were physically written on the document, does not disclose inserting text into the document. Insertion of text is not disclosed in Kashiwagi as a capability of the electronic memo adding and displaying apparatus, in contrast to Examiner's assertion. Kashiwagi distinguishes **inserting** text, as would be accomplished by a text editing unit, and **displaying** the electronic memo. Kashiwagi discloses that the apparatus can move a position of a memo displayed on a document, in response

to modification of the document such as by insertion of text, but Kashiwagi does not disclose any capability of the apparatus itself to insert text into the document. Therefore, Kashiwagi does not disclose or suggest the ability "to enable text selected from a first document displayed on one unit to be inserted directly at a predetermined location in a document displayed on the other unit", as is recited in claim 1.

Whereas Karidis fails to disclose a second text editing unit and fails to disclose enabling text selected from a first document displayed on one unit to be inserted directly at a predetermined location in a document displayed on the other unit, and whereas Kashiwagi fails to disclose enabling text selected from a first document displayed on one unit to be inserted directly at a predetermined location in a document displayed on the other unit, Karidis and Kashiwagi, whether considered independently or in combination with one another, fail to disclose all of the elements of claim 1. Therefore, claim 1 is patentable over the cited combination of Karidis and Kashiwagi.

Independent claims 10 and 15 include recitals similar to claim 1. Therefore, for reasoning similar to that provided in support of claim 1, claims 10 and 15 are patentable over the cited combination of Karidis and Kashiwagi.

Claims 2-8 depend from claim 1, claims 11-14 depend from claim 10, and claims 16-18 depend from claim 15. By virtue of these dependencies, claims 2-8, 11-14 and 16-18 are also patentable over the cited combination of Karidis and Kashiwagi.

For the reasons set forth above, it is submitted that the rejection of claims 1-8 and 10-18 under 35 U.S.C. 102(b) as anticipated by Bowen is erroneous. Applicants respectfully request that the rejection of claims 1-8 and 10-18 be withdrawn.

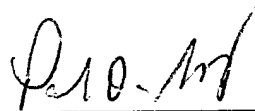
Claim 9 is rejected under 35 U.S.C. 103(a) as being unpatentable over Karidis and Kashiwagi and further in view of U.S. Patent No. 6,704,024 by Robotham et al., hereinafter "Robotham". Applicants traverse this rejection.

Applicants do not believe that Robotham makes up for the deficiencies of Karidis and Kashiwagi, as they apply to claim 1. Accordingly, Applicants submit that claim 1 and claim 9, by virtue of its dependence, are both patentable over the cited combination of Karidis, Kashiwagi and Robotham. Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claim 9.

An indication of the allowability of all pending claims by issuance of a Notice of Allowability is earnestly solicited.

Respectfully Submitted,

Date: 9-21-04



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